

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY**

BORIS GOLDENBERG, ET AL.,)	
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)	
PLAINTIFFS,)	HONORABLE JEROME B. SIMANDLE
)	
)	
VS.)	CASE No. 1:09-cv-05202-JBS-AMD
)	
INDEL, INC., INDIVIDUALLY AND A/K/A)	
INDUCTOTHERM INDUSTRIES, INC. AND)	
INDUCTOTHERM CORPORATION, ET AL.,)	
)	
DEFENDANTS.)	
)	

JOINT STIPULATION

Plaintiffs Boris Goldenberg, Reinaldo Pacheco, and Andrew Lowe (collectively, “Plaintiffs”), and Defendants American International Group, Inc., FSC Securities Corporation, SunAmerica Asset Management Corp., SunAmerica Capital Services, Inc., SunAmerica Fund Services, Inc., and Wharton Business Group (collectively, the “FSC/SunAmerica Defendants”) (hereinafter, the “Parties”), by and through undersigned counsel, hereby stipulate as follows:

1. On November 2, 2011, the FSC/SunAmerica Defendants’ filed their Motion for Partial Summary Judgment (Docket #119) (the “Defendants’ Motion”).

2. On November 16, 2011, Plaintiffs sent a letter to Magistrate Judge Donio invoking Local Rule 7.1(d)(5) with respect to Defendants’ Motion (Docket #123), and thereby setting the due date for Plaintiffs’ Opposition to Defendants’ Motion as December 5, 2011, the due date for FSC/SunAmerica Defendants’ Reply to Plaintiffs’ Opposition to Defendants’ Motion as December 12, 2011, and the return date for Defendants’ Motion as December 19, 2011.

3. On December 5, 2011, Plaintiffs filed their Opposition to Defendants' Motion and also filed a Cross-Motion for Partial Summary Judgment (Docket #133) (the "Plaintiffs' Cross-Motion").

4. The FSC/SunAmerica Defendants' Opposition to Plaintiffs' Cross-Motion is currently due on December 20, 2011.

5. Given the nature of these cross-motions for partial summary judgment, the Parties agree that the FSC SunAmerica Defendants' Reply in support of their Motion and the FSC/SunAmerica Defendants' Opposition to Plaintiffs' Cross-Motion should be combined into a single pleading for ease of reference and convenience for the Court.

6. Accordingly, the Parties further agree that the FSC/SunAmerica Defendants' combined Reply and Opposition shall be due on or before December 23, 2011.

7. The Parties further agree that the due date for Plaintiffs' Reply in support of Plaintiffs' Cross-Motion shall be extended from December 27, 2011, to January 10, 2012.

8. As a result of the Parties' agreement: (a) that the FSC/SunAmerica Defendants shall file a single pleading by December 23, 2011, that serves as their Reply in support of their Motion, and in Opposition to Plaintiffs' Cross-Motion; and (b) that the deadline for Plaintiffs to file their Reply in support of their Cross-Motion be extended to January 10, 2012, the return date for both Parties' motions shall be moved to January 17, 2012.

Respectfully submitted this 9th day of December, 2011.

/s/ Robert L. Lakind

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ORDER APPROVING STIPULATION

The parties having stipulated as stated above,

IT IS HEREBY ORDERED that the foregoing Stipulation is APPROVED IN ITS
ENTIRETY.

Dated: December_____, 2011

HON. JEROME B. SIMANDLE
U.S. District Judge